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March 31, 2006

Mr. Steve Maybury
New Jersey Department of Environmental Protection
Site Remediation & Waste Management
Division of Remediation Management and Response
Bureau of Northern Case Management
401 East State Street, 5th Floor
Trenton, New Jersey 08625-0028

Subject: Response Plan

Reference: Northeast Developers, Inc. Property located at 154 Stelton Road,

Piscataway, NJ

Dear Mr. Maybury:

On behalf of Ford Motor Company, Tetra Tech is submitting the attached Response Plan for the removal of crushed concrete material from the Northeast Developers Inc. (NEDI) property (although the owner of record is technically N.E.D. Associates LLC) located at 154 Stelton Road, Piscataway, NJ. This plan incorporates the specific requirements as outlined in the NJDEP Administrative Order issued to Ford Motor Company (Ford) on March 24, 2006 (EA ID # PEA06003 PI U1166).

All information in this Plan concerning the crushed concrete on the Northeast Developers' Stelton Road property, including the origin of the crushed concrete, was obtained from discussions with NEDI. Tetra Tech has relied on this information in drafting this Response Plan.

This plan details the removal and disposal of crushed concrete material currently located on the Northeast Developers property referenced above that was reportedly transported from the former Ford Edison Assembly Plant property located at 939 U.S. Highway Route 1 in Edison, New Jersey by NEDI. This Response Plan addresses the following major elements:

- 1. Prepare a public information and participation plan that includes:
 - Posting a notice of "Intended Remediation Activities" for the site.
 - Create an Information Fact Sheet.
 - Develop and Launch a Website.

- 2. Identify, remove and dispose of material at an approved disposal facility, if required.
- 3. Implement and maintain dust control measures including air monitoring.
- 4. Provide disposal tracking logs and documentation for crushed concrete materials removed from the NEDI property.
- 5. Collect and analyze "post-excavation" samples from the soil located below the removed material to insure that no material is left at the site.
- 6. Submit progress reports to the NJDEP.

Current Summary

The property is located at 154 Stelton Road, Piscataway, NJ. The site has been developed into a commercial office complex consisting of a two story masonry brick building with two associated parking areas. Reportedly, five to six truck loads (100 to 120 cubic yards) of crushed concrete material was transported to the property by NEDI for use as a sub-base for the two asphalt parking lots on the property. It has also been reported that this material was previously stockpiled at the NEDI property located at 201 Shevchenko Avenue, Piscataway, NJ. This site is also listed in the Administrative Order. Information concerning the Shevchenko Avenue site can be found in the Response Plan developed for this property. Analytical data representing the crushed concrete material presented to NEDI at the time of pickup from the Ford Edison Assembly Plant site indicates that the material meets the NJ Residential Direct Contact Soil Cleanup Criteria (RDCSCC). At present, no crushed concrete material is visible on the site. A site map is included as Attachment 1.

Public Information and Participation Plan

As part of the Public Information and Participation plan, Ford will post a notice of "Intended Remediation Activities" in a local newspaper. The notice will be a minimum of a quarter page and will list the intended remedial actions for the site along with proposed times and dates. The listing will also include company contact names and telephone numbers. Ford will also create an Information Fact Sheet that will be available for hand-out during any public meetings. The Fact Sheet will detail relevant site history activities, NJDEP involvement and proposed future remediation activities. Ford contact names, telephone numbers and e-mail addresses will be printed on the Fact Sheet. In addition, Ford will also develop and launch a website as a repository for information that can be accessed by the general public.

<u>Investigation and Delineation Sampling</u>

Based upon information supplied by NEDI, an estimated 100 to 120 cubic yards of crushed concrete material was used as a sub-base during the construction of the two asphalt parking areas located on site. As previously stated, NEDI has analytical data indicating that the crushed concrete meets RDCSCC criteria. To provide confirmation, Tetra Tech will perform delineation sampling utilizing a Geoprobe with direct push technology to evaluate the vertical and horizontal limits of the in-situ crushed concrete material. Samples will be collected at various locations based upon the approximate location of the crushed concrete material as reported by NEDI. The boundaries of the crushed concrete material will be considered established when horizontal and vertical samples do not contain crushed concrete material. Samples of the crushed concrete from below the parking area will be collected as per NJDEP protocol and will be analyzed for PCBs, Base Neutral compounds with a forward library search (B/N+15) and TPH. The collected samples will be sent to Severn Trent Laboratories, a NJ-certified laboratory.

In conjunction with the above noted sampling, a composite sample will be collected for waste classification analysis at a frequency of one sample per 500 cubic yards based upon the disposal requirements and frequency set by the Middlesex County Utility Authority (MCUA) landfill. This sample will be held by the laboratory pending the results of the delineation sampling described above. If the results indicate constituents above the RDCSCC criteria, waste classification analysis consisting of Total Petroleum Hydrocarbons (TPHs), Poly-Aromatic Hydrocarbons (PAHs)/Base Neutral (B/N) Compounds, Polychlorinated Biphenyls (PCBs), RCRA Characteristics, and Full Toxicity Characteristic Leaching Procedure (TCLP) Parameters will be performed. All samples will be analyzed on an accelerated turn-around time of one week (5 working days). A map depicting the proposed delineation sampling and waste classification locations will be prepared and submitted to the NJDEP upon completion of a preliminary investigation and when site access agreements have been negotiated.

The analytical results from the PCB, B/N+15 and TPH analysis will be compared to the NJ Residential Direct Contact Soil Cleanup Criteria (RDCSCC). If no PCBs greater than 0.49 ppm are detected and no other constituents exceed their respective RDCSCC, Ford will recommend that a No Further Action (NFA) letter be issued by NJDEP for this site. Should one more constituents exceed the RDCSCC criteria, Ford will implement the removal and disposal procedures outlined below.

Removal and Disposal Procedure

Upon completion and review of the waste classification sampling and analysis, the in-situ crushed concrete material will be removed by Ford. The material will be excavated and loaded directly into dump trailers/tri-axles for transportation to the disposal/re-use facility. Stockpiling of excavated material on-site is not anticipated. If possible, Ford will coordinate the excavation activities with NEDI to maintain a limited number of tenant parking spaces. All crushed concrete material leaving the site will be transported by a registered and licensed hauler, if required under applicable New Jersey Statutes and

regulations, to MCUA Middlesex County Landfill or BFI Conestoga Landfill. It is anticipated that the crushed concrete material will be transported to the landfill for use as cover material. A Tetra Tech site representative will ensure that all shipping manifests, bills of lading or any other required shipping documents have been properly completed for endorsement by Ford or Ford's appointed representative prior to trucks leaving the site. No material will leave the site without prior written approval from the NJDEP.

Dust Management Plan and Health & Safety Plan

A Dust Management Plan and site specific Health & Safety Plan (HASP) will be prepared for all workers entering the site. The HASP will be prepared in accordance with applicable Occupational Safety & Health Administration (OSHA) requirements.

All on-site activities will be conducted in a manner to minimize fugitive dust emissions. To accomplish this, the following controls will be implemented:

- All stockpiled material to be removed from the site will be covered or placed in tarped roll-off containers to prevent dust migration.
- A water truck and water spray will be used to control dust during removal and loading activities. Additionally, a road sweeper will be used at the site for routine road maintenance to actively control dust emissions.
- A real-time air monitoring program will be implemented before any removal
 work is performed. This will include monitoring of dust in the exclusion zone, at
 the perimeter of the site, and for personnel working in the exclusion zone. Also,
 a meteorological station will be placed at the site to record information such as
 daily temperatures, wind speed and direction, etc.
- All material loading will occur on a loading area prepared with two layers of 6-mil thick nylon reinforced polyethylene sheeting. After each truck is loaded, any material that may have spilled onto the body of the truck will be swept onto the polyethylene sheeting. Any loose material observed on and around the tires will be removed with a broom. Any material build-up on the reinforced polyethylene sheeting will be carefully swept and returned to the stockpile for load-out. Damaged polyethylene sheeting will be immediately replaced.
- Additional decontamination of the vehicles/equipment may take place in the event that the procedures described above are not sufficient to remove material. Absorbent tracking pads and/or a light power wash would be utilized in the event that dry-decontamination did not adequately remove material. This control will adequately address the concern for crushed concrete material leaving the site.

Ford will immediately cease removal activities at the site if any of the air monitoring action levels or other standards in the attached dust management program is exceeded. In addition, Ford will cease work if the control measures detailed in this Plan or any other provisions of the Administrative Order, regulations or law, are not being met. If this occurs, Ford will not resume work activities until the issues are resolved to the satisfaction of NJDEP.

The specific activities to be conducted for the air monitoring at the site are presented in Attachment 2.

Post Removal Sampling

In accordance with the NJDEP Technical Requirements for Site Remediation, post-excavation samples will be collected from all areas where the crushed concrete material is removed. (Bottom of excavation - 1 sample per 900 square feet; Sidewall - 1 sample for every 30 linear feet of sidewall with a minimum of one sample being collected). The post-excavation samples will be analyzed for PCBs, Base Neutral compounds with a forward library search (B/N+15), and TPH. The collected samples will be sent to Severn Trent Laboratories, which is a NJ certified laboratory. Laboratory analysis will be performed on an accelerated turn-around time of one week (5 working days). After receipt of analytical data, Ford will confirm PCBs greater than 0.49 ppm do not remain in the areas excavated and no other constituents exceed their respective RDCSCC. If any constituents remain above their respective RDCSCC in the areas of excavation, additional excavation will occur. A map depicting the proposed post removal sample locations will be developed and submitted to NJDEP prior to implementing post removal sampling.

Reporting

As required in the Administrative Order, Ford will provide the following information:

- Progress reports will be submitted to the NJDEP and the designated official from Piscataway Township on the 1st and 16th of each month of removal activity at the site. The progress report will include a summary of activities conducted and results of air monitoring for the period being summarized.
- A final report will be issued to the NJDEP and Piscataway Township officials within 14 days after completion of all remedial action activities and receipt of final analytical data. The final report will include a discussion of the procedures taken to eliminate all possible exposure from the material removed and the effectiveness of the procedures implemented to control fugitive dust emissions. The report will also include origin and disposal forms pursuant to Solid Waste Management regulations that identify all material removed form the site. This information will include the weight of the material and equivalent cubic yards.
- Other reports required by the NJDEP or other significant correspondence issued to the NJDEP will be provided to Piscataway Township officials.

<u>Schedule</u>

Ford will initiate work for the above referenced activities within 2 days after written approval from the NJDEP. Ford Motor Co. will complete remedial action activities within 30 days after approval of this plan.

Ford Motor Company will notify you prior to the start of any on-site activities and immediately if there are any changes to the schedule. If you have any questions, please contact me at 973-659-9996, extension 231.

Sincerely,

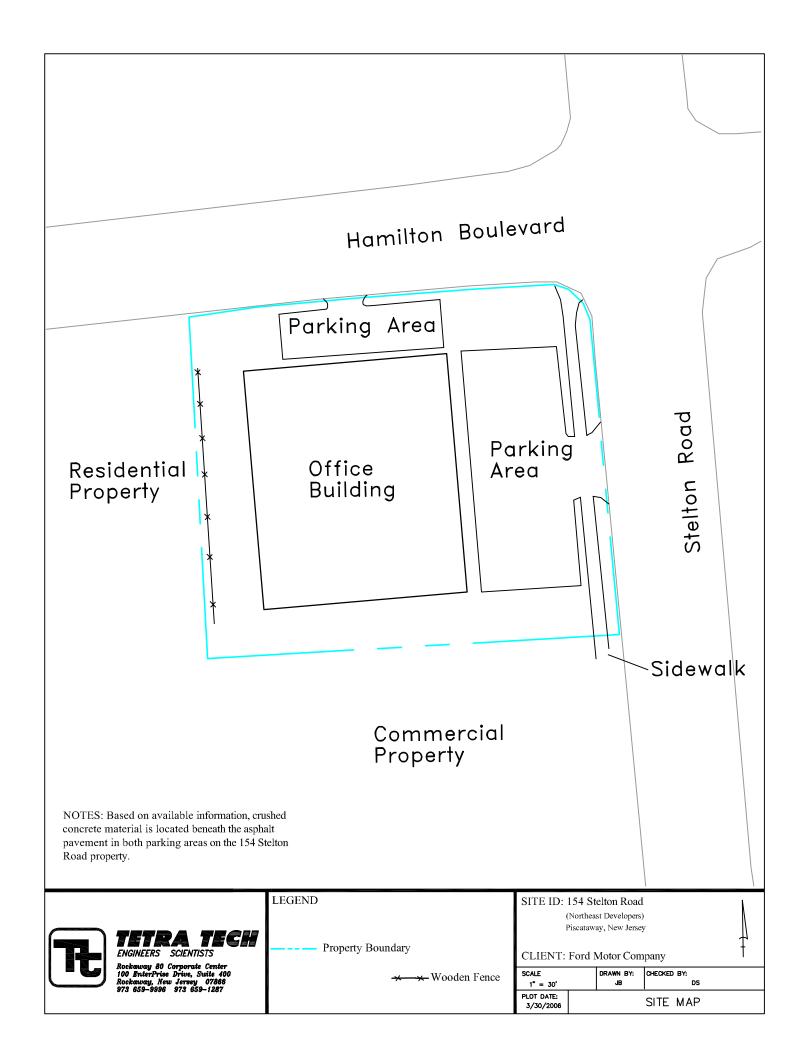
Douglas Sullivan

Senior Project Manager

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ATTACHMENT 1

(Site Map)



ATTACHMENT 2

(Dust Management and Health & Safety Plans)

DUST MONITORING PLAN

EXCLUSION ZONE MONITORING:

Purpose: Evaluate release of dust in zones to determine proper dust control measures.

- Exclusion zone (where work activities will occur) will be established.
- PDR-1000 Dust monitors will be located downwind at the perimeters of the exclusion zones.
- Action levels to implement dust control will be sustained readings (5 minutes) above 5 mg/m³.
- Visual assessment of dust levels will be used to implement dust control.
- Dust control measures shall be water or dry agents during cold weather and shall be on-site at all times.

PERIMETER MONITORING:

Purpose: To identify and control off-site dust emissions.

- Determine strategic perimeter sampling locations based on wind direction, on-site operations, neighboring properties, public thoroughfares, and NJ DEP concurrence.
- DR-4000 respirable particulate monitors (PM-10) with omni-directional inlets will be used to measure levels of respirable dust at perimeter of the property.
- Action levels to implement dust control or to trigger monitor for specific contaminates of concern (i.e. PCB's) will be sustained readings (15 minutes) above 150 ug/m³ as identified in the National Ambient Air Quality Standards (NAAQS). (See Attachment A-NAAQS Standards)

PERSONAL MONITORING:

Purpose: Evaluate worker exposure during normal work activities to be able to wear appropriate PPE.

- Determine personnel exposure of worker.
- Monitoring for total dust.
- Use pre-weighed filter cassettes and a low flow pump for dust sampling. (See Attachment B-Sampling Methods)
- Action level to implement upgrade of personal protection equipment (PPE) for dust is 15 mg/m³.

Based on the low levels of PCB's (Generally 2 ppm) the action level for dust that would trigger PCB concerns and monitoring is estimated at 500 mg/m^{3*}. If this action level is exceeded monitoring for PCB's will require the following:



- Use sorbent tube and low flow pump for PCB sampling. (See Attachment B-Sampling Methods)
- Action level to implement upgrade of personal protection for PCB's is 0.001 mg/m³ for the National Institute for Occupational Safety and Health (NIOSH) and 1 mg/m³ for the Occupational Safety and Health Administration (OSHA). Tetra Tech recommends using the NIOSH standard as an action level for upgrading PPE.

*Formula to correlate PCB levels in soil to dust levels is:

(Calculation: Convert PCB soil levels to a fraction (2 mg/kg = 0.000002) and multiply by the particulate concentration). For example if the particulate concentration is at 500 mg/m^3 then the concentration of PCB in air is 0.001 mg/m^3 , which is the REL.

METEOROLOGICAL STATION:

Purpose: To record weather conditions related to the site.

- Determine location of METSTATION.
- Record daily the temperature, relative humidity, barometric pressure, wind speed and direction.
- Assess this information and correlate with particulate monitoring results.

REPORTING:

Purpose: To ensure communications between all parties.

- Progress reports will be submitted to Ford prior to the 1st and 16th of each month.
 Ford will issue reports to the NJDEP and municipal officials in accordance with the Administrative Order EA ID #: PI V1166.
- Progress reports will summarize results of the perimeter monitoring and meteorological information during that period.
- Final report will be generated at the end of the project and will include all perimeter
 monitoring results, meteorological information, and field documentation logs
 ensuring the effectiveness of the dust management plan. Ford will issue reports to the
 NJDEP and municipal officials in accordance with the Administrative Order EA ID #:
 PI V1166.

CONCLUSION:

Monitoring of dust levels will take place prior to removal activities, during removal activities, and after removal activities are complete.



ATTACHMENT A (NAAQS Standards)

National Ambient Air Quality Standards

POLLUTANT		NDARD LUE *	STANDARD TYPE						
Carbon Monoxide (CO)									
8-hour Average	9 ppm	(10 mg/m ³)	Primary						
1-hour Average	35 ppm	-	Primary						
Nitrogen Dioxide (NO ₂)									
Annual Arithmetic Mean	0.053 ppm	(100 µg/m³)	Primary & Secondary						
Ozone (O ₃)									
1-hour Average	0.12 ppm	(235 µg/m³)	Primary & Secondary						
8-hour Average	0.08 ppm	(157 μg/m ³)	Primary & Secondary						
Lead (Pb)									
Quarterly Average	1.5 µg/m³		Primary & Secondary						
Particulate (PM 10) Particle:	s with diameters of	10 micrometers o	r less						
Annual Arithmetic Mean	50 μg/m³		Primary & Secondary						
24-hour Average	150 μg/m³		Primary & Secondary						
Particulate (PM 2.5) Particle	s with diameters of	f 2,5 micrometers (or less						
Annual Arithmetic Mean	15 µg/m³		Primary & Secondary						
24-hour Average	65 μg/m ³		Primary & Secondary						
Sulfur Dioxide (SO ₂)									
Annual Arithmetic Mean	0.030 ppm	(80 µg/m³)	Primary						
24-hour Average	0.14 ppm	(365 µg/m³)	Primary						
3-hour Average	0.50 ppm	(1300 µg/m³)	Secondary						

^{*} Parenthetical value is an approximately equivalent concentration.

ATTACHMENT B (Sampling Methods)







SKC Home

Guide to OSHA/NIOSH/ASTM Air Sampling Methods

Homeland Security Contact SKC

Dust total nuisance

Search

Products

Chemical Hazard: Dust total nuisance

Ordering

Agency Reference:

OSHA CSI

What's New **Customer Service**

Agency Standards

Rentals

TWA (ppm): 15 mg/m3

Downloads

Sales & Service

Sample Volume (liter)

Email Newsletter Catalog Request

TWA: 720

Sampling Help

Sampling Guides

Sampling Rate (ml/min)

Laboratories

TWA: 1500

Links

About SKC

Sampling Time

Events / Seminars

TWA (hours): 8

Site Map

Analytical Method: GR - Gravimetric Analysis

SKC Equimpent: Filter 225-8-01SC

Filter Cassette and Cyclone Holder 225-1

Filter Cassette 225-2LF

Footnotes: CSI-OSHA Chemical Sampling Information (OSHA CD-RO)

Chemical Hazards by First Letter





SKC Home

Contact SKC

Guide to OSHA/NIOSH/ASTM Air Sampling Methods

Homeland Security

Polychlorinated biphenyls

Search

Products Chemical Hazard: Polychionnated biphenyls

Ordering CAS Number: 1336-36-3

What's New Agency Reference: NIOSH 5503

Customer Service

Rentals Agency Standards

Downloads
TWA (ppm): 0.001 mg/m3 (10 hr)

Sales & Service

Email Newsletter
Sample Volume (liter)

Catalog Request

TWA: 48 Sampting Help

Sampling Guides

Sampling Rate (ml/min)

Links TWA: 100 (200)

About SKC

Events / Seminars Sampling Time

Site Map TWA (hours): 8 (4)

Analytical Method: GC-ECD - Gas Chromatography-Electron Capture Detecto

SKC Equimpent: Filter 225-16

Filter Cassette 225-32 Sorbent Tube 226-39

Limit of Detection: 0.03µg/sample

LOD Note:

The policies of the AIHA laboratory accreditation committee require that method detection limits must be established and



Site Name: Stelton Road (Northeast Developers, Inc.)	EMI Site Contact: Matt Bianchi			-	Telephone: (973) 659-9996		
Location: 154 Stelton Road, Piscataway, New Jersey	Client Site Contact: Mr. Todd Walton			Telephone: (313) 845-1921			
EPA I.D. No.	Prepared By: Doug Sullivan			Date: 31 March 2006			
Project No. IP483.04	Date of Activities:						
Objectives: Removal of crushed concrete material at the Stelton Road site. Other activities will include implementation of: dust control measures including air monitoring; post-excavation sampling; and traffic control. This includes managing the flow of trucks and equipment entering and leaving the site to ensure worker and presented.			Active Inactive		Uncontrolled Controlled		Residential Industrial
Details regarding these activities to be conducted at the Stelton Roa have been outlined in the Response Plan prepared by Tetra Tech da March 31, 2006. This site-specific HASP is intended to ensure site activities are conducted in a safe and efficient manner. Also, this sit specific HASP relies on the specific health and safety provisions out in Tetra Tech's HASP for the Edison, NJ site (dated February 24, 20	ated ite- tlined						



Initial Site information	
As discussed in Tetra Tech's Response Plan, the crushed concrete material current former Ford Edison Assembly plant property located in Edison, NJ. This material wi	
Applicable Safe Work Practices (SWP) attach to HASP: Check as many as applicable SWP 6-1 - General Safe Work Practices SWP 6-2 - Control of Hazardous Energy Sources (Lockout/Tagout) SWP 6-3 - Safe Drilling Practices SWP 6-4 - Excavation Practices SWP 6-5 - Working Over or Near Water SWP 6-6 - Hot Work Practices SWP 6-7 - Special Site Hazards SWP 6-8 - Safe Electrical Work Practices SWP 6-9 - Fall Protection Practices SWP 6-10 - Portable Ladder Safety SWP 6-11 - Drum and Container Handling Practices SWP 6-13 - Flammable Hazards and Ignition Sources SWP 6-14 - Spill and Discharge Control Practices SWP 6-15 - Heat Stress SWP 6-17 - Biohazards SWP 6-21 - Radiation Safety Practices SWP 6-22 - Hydrographic Data Collection	SWP 6-23 - Permit-Required Confined Space SWP 6-24 - Non-Permit-Required Confined Space SWP 6-25 - Oil and Petroleum Distillate Fuel Product Hazards SWP 6-25 - Use of Heavy Equipment SWP 6-27 - Respirator Cleaning Procedures SWP 6-28 - Safe Work Practices for Use of Respirators SWP 6-32 - Safe Work Practice for Sampling Anthrax Contamination in Buildings SWP 6-33 - Safe Work Practice for UXO-Related Site work Tetra Tech Employee Training and Medical Requirements: Basic Training and Medical Initial 40 Hour Training 8-Hour Supervisor Training (one-time) Current 8-Hour Refresher Training Current Medical Clearance (including respirator use) Current Medical Clearance (including respirator use) Current First Aid Training (minimum 1 Tetra Tech employee on site) Current CPR Training (minimum 1 Tetra Tech employee on site) Current CPR Training (minimum 1 Tetra Tech employee on site)



Field Activities Covered Under This Plan:												
		Level of Protection ¹										
Task Description		Primary			Contingency				Date of Activities			
1 Air monitoring/Dust Control/Management of trucks/equipment		□ A	В		С	⊠ D	□ A	В	□ C	□ D	TBD	
Excavation/removal of crushed concrete aggregate materials; Post-excavation sampling		A	В		С	⊠ D	Па	В	С	О	TBD	
Site Personnel and Responsibilities (include subcontractors):												
Employee Name and Office Code	Task(s)						Responsibilities					
Project Manager (Doug Sullivan)	1 and 2				•		dinator (S	SC) aware	of pertinent	project deve	Leader and Site lopments and plans,	
Field Team Leader/Site Safety Coordinator (SSC) (TBD) The roles of Field Team Leader and site Safety Coordinator are allowed to be fulfilled by the same person.	1 and 2				•	aware of pe communica exceedance Ensures that enforces pro	rtinent pro tions with es to the Na at appropria oper utiliza	ect develop client as ne JDEP and l ate persona tion of PPE	oments and cessary. Re ocal official orotective by on-site	plans, and nesponsible for supon discording equipment (personnel, s	coordinator (SSC) naintains or reporting any overy of exceedances. PPE) is available, uspends investigative be exposed to an	
						immediate h	nealth haza ed deviation	ord, implem ns from ant	ents the he icipated cor	alth and safe nditions desc	ty plan, and reports ribed in the health and	
Field Personnel	1 and 2				•		nd follows	all procedu	res and gui		team leader/SSC, blished in the Tetra	

Emergency Contacts:	Telephone No.				
Work Care	(800) 455-6155				
U.S. Coast Guard National Response Center	(800) 424-8802				
InfoTrac	(800) 535-5053				
Hospital	(609) 394-6000				
Fire department	911				
Police department	911				
Tetra Tech EM Inc. Personnel:					
Regional Safety Officer: Matt Bianchi (973) 659-9996, ext. 237					
Health and Safety Representative: Rick Ecord, CIH (404) 225-5527					
Office Health and Safety Coordinator: Matt Bianchi (973) 659-9996					
Project Manager: Doug Sullivan (973) 659-9996, ext. 231					
Field Team Leader/SSC: To Be Determined (TBD)					

Hospital Route Map: YAHOO! William St New Market Middlesex 603 A 529 607 665 Stelton Rd Possumtown Centennial Ave Newtown New Durham Randolphville North Stelton Society Hill Hoes Ln E 514 609 Edison Riverview Manor River Rd Stelton (18) Haven Homes 692 Buccleuch Franklin Twp Ratitan Ave Highland Park @2005 NAV/TEQ @ 2005 Yahoo! Inc **Directions** 1 Start at 154 STELTON RD, PISCATAWAY going toward HAMILTON . **BLVD** - go **0.9** mi 2 Turn right to follow CR-665 - go 1.3 mi 3 Continue on **S WASHINGTON AVE** - go < **0.1** mi 4 Continue to follow **CR-609** - go **2.6** mi 5 Turn right on RIVER RD[RT-18] - go 0.2 mi 6 Turn left on **LANDING LN** - go **0.6** mi 7 Turn left on EASTON AVE - go 0.5 mi 8 Arrive at ST PETER'S MEDICAL CENTER